

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
v.)	Cr. No. 1:19-cr-10040-JTF
)	
ALEXANDER ALPEROVICH, M.D.)	
JEFFREY YOUNG)	
ANDREW RUDIN, M.D.)	

**MOTION FOR THE ENTRY AN AMENDED PRETRIAL ORDER ON DISCOVERY
AND SCHEDULING**

Comes the defendant, Alexander Alperovich, M.D., through counsel and with the agreement of all parties, and respectfully moves this Court for the entry of an Amended Pretrial Order on Discovery and Scheduling. The trial in this matter is currently scheduled on March 15, 2021.

In further support, the following is stated:

(1) On June 4, 2020, the Court entered a Scheduling Order (Doc. 174), at the agreement of the parties. Since then, the government moved to amend the Scheduling Order due to unforeseen circumstances with production of electronic discovery materials that may be subject to a claim of attorney-client privilege. (Doc. 177). The Court entered an Order granting the government's motion to amend the Scheduling Order (Doc. 178) and an Order granting the government's Motion for Discovery Protocol Governing Disclosure of Material Subject to Claims of Privilege (Doc. 182).

(2) Upon motion of Defendant Alexander Alperovich, and agreement of the parties, the Court entered an Order vacating the remaining pretrial deadlines in the Scheduling Order (Doc.

174) given the pending privilege claim issues. (Doc. 188). The Court gave the parties until November 20, 2020, to either submit an agreed pretrial schedule to the Court or to submit their respective positions. Id.

(3) The parties agree on an amended pretrial schedule with the intention of attempting to preserve the currently scheduled trial date of March 15, 2021.

(4) A proposed order for the Court's consideration will be sent to chambers.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on November 20, 2020, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

s/Stephen Ross Johnson